



April 29, 2019

Mr. David Alberg
Monitor National Marine Sanctuary
100 Museum Drive
Newport News, VA 23606
Via email to: david.alberg@noaa.gov

Re: OceanGate Expeditions, Ltd.'s 2019 *Titanic* Survey Expedition

Dear Mr. Alberg:

In accordance with Ms. Rolleri's request in her letter to me dated April 18, 2019, the following provides additional information that NOAA may consider as it sees fit.

I believe that my April 1, 2019 letter to Judge Rebecca B. Smith of the U.S. District Court for the Eastern District of Virginia, to which you were copied, makes clear that OceanGate Expeditions, Ltd.'s ("OGE") 2019 *Titanic* Survey Expedition is well conceived and managed by a group of careful, experienced explorers, researchers, engineers, and business people capable of ensuring that all dives will be non-invasive, non-contact and will not physically alter or disturb the site of the *Titanic*. For reasons explained below, OGE is unable to provide some of the information NOAA has requested, but we hope we can work together to gather the most useful data sets possible to preserve and protect the *R.M.S. Titanic*.

NOAA's request for information regarding "the identity, qualifications, experience and responsibilities of the team members" cannot be supplied because many of OGE's active participants are private individuals who value their right to privacy. In addition, their identities and profiles are an asset of OGE, entitled to the same legal protection as trade secrets as customer lists and other similar information.

The request for "plans for report preparation, contents and dissemination to the public" has no bearing on NOAA's interest in determining that the wreck will not be "physically altered or disturbed" per the authorizing legislation Ms. Rolleri cites. OGE's sister organization, the OceanGate Foundation, has been coordinating with the researchers participating in the expedition and their publication plans are at their discretion; the only requirement placed on the researchers by the OceanGate Foundation (which pays some of their expenses) is to do one or more public outreach events to publicize their conclusions and to publish their work in academic journals. OGE will be happy to provide you with advance notice of these events and, if possible, copies of the researchers' publications.

100 Sun Valley Road, Box 329, Sun Valley, Idaho 83353 Ph: (610) 293-8084
www.explorerconsulting.com

OGE has already provided more information than is legally required to both the U.S. District Court and NOAA because the mission of its affiliated company, OceanGate, Inc., is to expand mankind's understanding of the ocean. For many years, OceanGate, Inc. has tried to draw positive public awareness to the ocean and the National Marine Sanctuaries through, for example, its *Eye on the Sanctuaries* project (under an MOA with NOAA) and other missions like the 2013 Lionfish expedition, where OceanGate, Inc. has provided submersible dives to NOAA personnel and affiliates **free of charge**.

In addition, OceanGate, Inc.'s ABS-classed *Antipodes* submersible, its Health, Safety and Environmental manual and its operations protocols, have previously been evaluated by Dana Wilkes (NOAA Chief Mariner) and approved for NOAA operations. Accordingly, there should be no question about the qualifications and procedures employed by OGE or OceanGate, Inc. to conduct the 2019 *Titanic* Survey Expedition using similar procedures for the *Titan* submersible.

OGE plans to provide significant public benefit by scanning and photographing the *Titanic* wreck and wreck site at resolutions never before achieved and by sharing this information with researchers and the public. Moreover, OGE's unique business model engages citizen scientists to help fund annual expeditions to document the wreck of the *Titanic* which, in turn, assists NOAA and other interested parties in ensuring that the wreck site is not disturbed or subjected to unauthorized salvage, as happened in 2002. As history has shown, without such funding the site will be monitored at best once a decade.

It is clear that traditional funding models are insufficient to support sustained exploration and thorough documentation of the *Titanic* wreck and wreck site. OGE would like to work with NOAA to help it annually monitor the *Titanic*'s condition and expand the breadth of knowledge of the wreck and the debris field, and to develop methods of assessing the degradation of other historic shipwrecks and their potential for environmental impact. If NOAA could provide a list of desirable scanning targets or other objectives with which OGE can help assess and monitor, please let us know.

We look forward to working in cooperation with NOAA to document and protect this historic site.

Sincerely,

A handwritten signature in blue ink that reads "David G. Concannon". The signature is fluid and cursive, with the first name "David" being more prominent.

David Concannon

cc: Jackie Rolleri, Esq., NOAA